

# **EXHIBIT 7**

1 - - -  
2 IN THE UNITED STATES DISTRICT COURT  
3 FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
4 - - -

5 ASSATA ACEY : CIVIL ACTION  
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Job No. CS6641996

vs. : No. 2:23-cv-01438

Tuesday, April 9, 2024

Oral Deposition of DANIEL HACKMAN, taken  
remotely via Zoom with the witness being present  
at 640 Mohawk Avenue, Pennsylvania 19074,  
beginning at 10:04 a.m., reported stenographically  
by Barbara C. Logan, Certified Professional  
Shorthand Reporter and a Pennsylvania Notary  
Public.

DANIEL HACKMAN

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1 Q. -- did you report it to anyone?

2 A. No.

3 Q. Did you say anything to anyone about  
4 it?

5 A. No.

6 Q. Do you know whether anyone said  
7 anything to mis- -- to Bill Gallagher about it?

8 A. I do not know.

9 Q. Can you provide any additional  
10 examples of memories that corroborate anything  
11 Ms. Acey is claiming in this case?

12 A. Can you clarify your question, please?

13 Q. Sure.

14 What other memories do you have of  
15 instances when you were working at Momentum of  
16 something that stuck out to you as racially  
17 denigrating?

18 We'll start with race.

19 A. Racially denigrating. I'm going to  
20 say no. I can't say that I have memories of  
21 witnessing or observing anything as far as race is  
22 concerned.

23 Q. Okay. How about sex is concerned?

24 A. Sure.

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1 discrimination.

2 Q. Okay. I'll -- Ms. Acey has made very  
3 specific claims in this case with respect to race  
4 and sexual harassment.

5 Would you agree with me that they're  
6 very serious claims; right?

7 A. Oh, yes.

8 Q. Can you provide me specifics, specific  
9 concrete examples, not abstract general themes,  
10 but specifics of things that you witnessed at  
11 InductEV that suggest that Ms. Acey was  
12 discriminated against on the basis of race?

13 A. I'm going to say, no, I don't think I,  
14 personally, witnessed anything that -- no, I don't  
15 think so.

16 Q. How about with respect to sex?  
17 Can you provide me with a specific  
18 example of something that you witnessed that  
19 suggests that Ms. Acey was subject to sexual  
20 harassment at work?

21 And just to qualify my question, I'm  
22 not asking about things that you heard from  
23 somebody else.

24 A. Right. Right. I understand.

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1 Q. Things you witnessed.

2 A. I understand.

3 No, the answer is no, I cannot.

4 Q. Okay. So it's fair to say you didn't  
5 witness a single instance of behavior that you  
6 considered to be sexual or racial animus directed  
7 toward Ms. Acey; is that right?

8 A. I'm sorry. I think you cut out for  
9 just a second.

10 Could you repeat that?

11 Q. Is it fair -- is it fair to say that  
12 you did not witness a single instance of racial or  
13 sexual animus directed toward Ms. Acey during your  
14 time at InductEV?

15 A. I think that's fair to say, yes.

16 Q. During your time at Momentum did you  
17 notice behavioral changes in Ms. Acey?

18 In other words, was Ms. Acey acting  
19 different?

20 A. Is your question did I notice a change  
21 in her over time while she was employed there?

22 Q. Let me strike the question.

23 When you and Ms. Acey worked together  
24 at Momentum, did you notice Ms. Acey's attitude

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1 Do you have any experience working  
2 with Patti Rensel?

3 A. I'm going to say no. I knew -- I know  
4 who she is. I had even less and fewer  
5 interactions with her than I did with Judy Talis.  
6 If I remember correctly, she sat in the front  
7 office of the old building. So it was common to  
8 pass her, you know, on my way in or on my way out  
9 some days. So we would occasionally wave or say  
10 good night or good morning. I believe that was  
11 the extent of it. I don't remember -- I don't  
12 remember having much more interaction with her  
13 than that.

14 Q. Okay. So like Judy Talis, there was  
15 never anything that Patti Rensel did or said that  
16 led you to believe she had any racial animus;  
17 right?

18 A. I think that's right. I don't think I  
19 noticed anything.

20 Q. Similarly, there was never anything  
21 Patti Rensel did that led you to believe that she  
22 had any degree of animus based on sex; right?

23 A. Correct.

24 Q. How about gender?